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August 27, 2004

U.S. Department of Transportation
Docket Management System
400 Seventh Street, SW
Nassif Building, Room PL-402
Washington, DC 20590-0001

RSPA - 2004-17664-16

SUBJECT: Research and Special Programs Administration Docket Number
[RSPA-04-17664 (HM-224B)] RIN 2137-AD33

Dear Sir/Madam:

With respect to the Research and Special Programs Administration Docket Number [RSPA-04-17664 (HM-224B)] RIN 2137-AD33 Notice of Proposed Rulemaking, United Parcel Service Co. (UPS) would like to make the following comments under Section III. B. Proposed Amendments to the Hazardous Materials Regulations (HMR) and Section V., Request for Comments:

Under Section III. B. of Proposed Amendments to the HMR, the last paragraph states that "In this NPRM, we are also proposing that the cylinders authorized for the transportation of compressed oxygen aboard aircraft be limited to DOT specifications 3A, 3AA, 3AL, and 3HT". UPS recommends that consideration be given to add the cylinders that are made of lightweight composites as long as they are stored in the appropriate heat and flame resistant containers. These lightweight composite cylinders have become popular due to their light weight and are being used by several airlines.

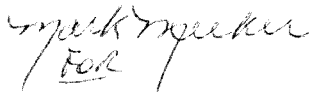
Under Section V., Request for Comments, UPS has the following comments to the questions asked in this section:

1. The protocol lab tests are a way to approximate the conditions of a real-life incident.
2. UPS uses one type of large oxygen cylinder as well as one type of portable oxygen cylinder in the cabin area. We estimate a minimum of 30 – 50 packaging units would be needed to transport cylinders throughout the system.
3. Yes, UPS uses the same part number oxygen cylinder on all their aircraft making one type of outer packaging uniform to our fleet.
4. UPS does not have data for retrofitting costs of the existing containers but believes that it is more practical to design a new outer packaging.
5. The cost of manufacturing the new outer packaging, which meets the standards in Part III of Appendix F to 14 CFR Part 25, "Test Method to Determine Flame Penetration Resistance of Cargo Compartment Liners", will represent a significant cost increase from the existing units in service today. The current cost of existing packages ranges from \$435 - \$500. UPS believes that the cost for the new packaging equipment will exceed \$2000 per unit. Additionally, UPS is not aware of any company currently manufacturing packaging that meets this CFR for oxygen cylinders

6. If it is possible to find an area inside of the fire blocking liners in the cargo compartments where the oxygen cylinders could be safely secured, this would be an alternate means of safely transporting the oxygen cylinders without any special packaging.
7. The one year compliance time is not a realistic timeframe due to the unavailability of outer packaging meeting Part III of Appendix F to 14 CFR Part 25, "Test Method to Determine Flame Penetration Resistance of Cargo Compartment Liners". We believe that a 3 year timeframe would be more realistic.
8. Different packaging standards would only be a good idea if it represents a cost saving to the operators. If not, one uniform standard will be simpler to comply with.
9. Yes, cargo aircraft should be allowed to carry the oxygen bottles using the existing containers and 400 degrees Fahrenheit should be acceptable.
10. The 400 degrees Fahrenheit should be acceptable.
11. UPS part number cylinders already meet this requirement. This was confirmed with the manufacturer.
12. UPS recommends that the flame penetration standard should be incorporated by reference into HMR.
13. Per the UPS Flight Safety Department, there are no other oxidizing gases being transported at this time.
14. UPS operation does not deal in this area.
15. UPS operation does not deal in this area.

We appreciate your consideration of our comments on this matter. If you require any additional information, contact Mario Gonzalez, Aircraft Systems Engineer, at (502) 329-6018.

Sincerely,



Tony McBride
Manager
Quality Assurance

TM:MG:smp

cc: Mario Gonzalez